

**UNITED STATES DISTRICT COURT  
THE SOUTHERN DISTRICT OF NEW YORK**

SECURITIES AND EXCHANGE  
COMMISSION,

Plaintiff,

v.

LEK SECURITIES  
CORPORATION, et al.,

Defendants.

**Case No. 17-CV-1789 (DLC)**

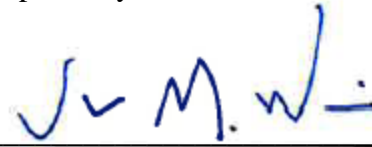
**DEFENDANTS PUSTELNIK, FAYYER AND AVALON’S MEMORANDUM OF LAW  
IN SUPPORT OF MOTION *IN LIMINE* TO PRECLUDE THE SEC OR THE COURT  
FROM USING OF THE PHRASE “AVALON DEFENDANTS”**

**PLEASE TAKE NOTICE** that, upon Defendants Sergey Pustelnik, Nathan Fayyer, and Avalon FA Ltd.’s (“Defendants”) Memorandum of Law in Support of their Motion *in Limine* to Preclude the SEC or the Court from using the phrase “Avalon Defendants,” and all pleadings, papers and proceedings in this action, Defendants will move this Court before the Honorable Denise L. Cote at the U.S. Courthouse located at 500 Pearl Street, NY, NY, at a date to be determined by the Court, for an Order precluding the SEC or the Court from using the phrase “Avalon Defendants” at trial, and for such other relief as this Court may deem just and proper.

**PLEASE TAKE FURTHER NOTICE** that pursuant to the Court’s June 12, 2019 Scheduling Order, Plaintiff shall serve opposing papers no later than September 27, 2019, reply papers shall be due October 2, 2019.

Dated: September 13, 2019

Respectfully submitted,

A handwritten signature in blue ink, appearing to read "J. M. Wines", is positioned above a horizontal line.

James M Wines

**Law Office of James M Wines**

1802 Stirrup Lane

Alexandria, VA 22308

202.297.6768

winesj@wineslegal.com

Steven Barentzen

**Law Office of Steven Barentzen**

17 State Street, Suite 400

New York, NY 10004

Phone: (917) 476-0953

Fax: (202) 888-6268

Steven@barentzenlaw.com

Attorneys for Defendants Sergey Pustelnik,  
Nathan Fayyer and Avalon FA LTD